

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

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GARY SUOJA, Individually and as Special	)	
Administrator of the Estate of OSWALD	)	
SUOJA, Deceased,	)	
	)	
Plaintiff,	)	Case No. 99-cv-475-bbc
	)	
v.	)	
	)	
Owens-Illinois, Inc.,	)	
	)	
Defendant.	)	

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**Plaintiff's Pretrial Disclosure**

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Pursuant this Court's order of April 10, 2015, (ECF No. 77) and Federal Rule of Civil Procedure 26(a)3, Plaintiff makes the following pretrial disclosure:

**1) Witnesses**

- a) Witnesses Plaintiff expects to present at trial in person
  - i) George Schlub, client of Cascino Vaughan Law Offices, Ltd. (CVLO)  
Contact CVLO  
  
220 S. Ashland Avenue, Chicago IL 60607  
(312) 944-0600
  - ii) Arnold Brody, Ph.D.  
Department of Molecular Biomedical Sciences  
North Carolina State University  
4700 Hillsborough St.  
Raleigh, NC 27606  
919-513-7662
  - iii) Stephen Kenoyer  
8207 Callaghan, Suite 350  
San Antonio, Texas 78230

210-824-5600

iv) Gary Suoja, Client of CVLO, Contact CVLO

220 S. Ashland Avenue, Chicago IL 60607

(312) 944-0600

v) Kimberly Suoja, Client of CVLO, Contact CVLO

220 S. Ashland Avenue, Chicago IL 60607

(312) 944-0600

vi) Peter Neushul, Retained O-I Witness

Graves & Neushul Historical Consultants

915 Camino Lindo

Goleta, CA 93117

b) Witnesses Plaintiff expects to present via deposition:

i) Arthur Frank, M.D., Ph.D.

Drexel University School of Public Health

245 N. 15<sup>th</sup> St., Mail Stop 1034

Philadelphia, PA 11902-1192

267-359-6048

ii) Michael F. Slag, MD

Essentia Health Department of Endocrinology

502 E 2nd St, Duluth, MN 55805

(218) 786-8364

iii) Thomas H. Wiig, MD

Essentia Health

400 E 3rd St

Duluth, MN 55805

218-722-8364

- iv) Lawrence Zimmer, deceased, by deposition taken February 2 and 3, 2012, designations attached at page 9.
- v) Richard Grimmie, deceased, by deposition taken September 20, 1991, and October 28, 1991,  
designations attached at page 5-6.
- vi) Willis Hazard, deceased, by deposition taken February 11, 1981, designations attached at page 6-7.
- vii) Daniel Braun, deceased, by deposition taken May 5, 1982, designations attached at page 7.
- viii) George Schlubb, by deposition of January 27, 2012, designations attached at page 8.
- ix) Harold Haase, deceased, by deposition of February 11, 1999, designations attached at page 10.

c) Witnesses Plaintiff may call if the need arises:

- i) Barry I. Castleman, Sc.D.  
4406 Oxford Rd., Garrett Park, Maryland  
20896.  
301-933-9097

**3) Exhibits**

- a) Exhibits Plaintiff Expects to Present, list attached separately as pages 11-16.
- b) Exhibits Plaintiff May Present if need arises, list attached separately as pages 17-70.

Dated: October 20, 2015

/s/ Robert G. McCoy  
Attorney for Plaintiff

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